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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

X

YVONNE ROBINSON, ROSE CIROS, JESSE R. HOWELL
individually and on behalf of all others similarly situated,
Plaintiffs,

vs.

KIA MOTORS AMERICA INC; KIA MOTORS
MANUFACTURING GEORGIA INC., KIA MOTORS
CORPORATION, Kia Motors Co., Ltd.,
SEOUL SOUTH KOREA COMPANY(S),
Hyundai Motor Company, XYZ CORP
Defendants.

Case No.: 13-00006 ES-SCM

X

**[PROPOSED] ORDER GRANTING PLAINTIFFS' UNOPPOSED MOTION FOR FEES,
EXPENSES AND INCENTIVE AWARDS**

WHEREAS, Plaintiffs and Defendants executed an agreement to settle this matter, subject to Court approval;

WHEREAS, the Court reviewed the parties' Settlement Agreement and issued an order granting preliminary approval to it on 11/3/2016 See Docket Entry No. 72;

WHEREAS, section VII, Paragraph 50 of the Settlement Agreement provides that Kia Motors has agreed to pay, subject to Court approval, the amount of up to \$275,000.00 to Plaintiffs' Counsel for their attorneys' fees and expenses;

WHEREAS, the Settlement Agreement also provides, in section VII, Paragraph 50, that Kia Motors agrees to pay (and shall pay, if approved by the Court), incentive awards to named plaintiffs (\$2,500.00 each to Yvonne Robinson, Rose Ciros, Robert McConnell, Jesse Howell & Cheryl Moxey; \$1,500.00 each to Phillip Doran and Irene Goodwin, who had both had their claims dismissed or a total amount of \$15,500.00 incentive total).

WHEREAS, after considering Plaintiffs' motion, memorandum of law and supporting materials (including certification from counsel) as well as any material(s) that may be filed in opposition thereto, the Court having concluded that Plaintiffs' request for fees, expenses, and the payment of incentive awards is reasonable, permissible under the applicable law, and in accordance with the Settlement Agreement.

IT IS ORDERED AS FOLLOWS:

1. Plaintiffs' Unopposed Motion for Fees, Expenses, and Incentive Awards to Plaintiffs is GRANTED.
2. Kia Motors shall pay Plaintiffs' counsel \$275,000.00 for their attorneys' fees and expenses, in accordance with the Settlement Agreement;
3. Kia Motors shall also make an additional payment of \$15,500.00 to Plaintiffs' counsel for the incentive awards for the Class Representatives, which amounts shall then be remitted by Plaintiffs' counsel to the Plaintiffs in accordance with the Settlement Agreement.
4. All other payments and costs shall be borne as set forth in the Settlement Agreement or as agreed to by the parties.

IT IS SO ORDERED.

Dated: _____

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